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March 6, 2012

Our File: 3517

Via email: mfrankel@bfklaw.com

Mark Frankel, Esq.
Backenroth Frankel & Krinsky, LLP
489 5th Avenue
New York, New York 10017

Re: Madison Hotel Owners LLC

Dear Mr. Frankel:

As you recall, I have been retained by the following members of Madison Hotel Owners, LLC: Ofek Rachel Ltd., Bolour 62, Mad LLC, M.M.N. Yad David USA Ltd., Ruth Malki and Havazelet Miller.

Please be advised that the matter on behalf of my clients will be handled by my office in conjunction with Kenneth A. Rosen, Esq. of the law firm Lowenstein Sandler, 65 Livingston Avenue, Roseland, New Jersey 07068.

My clients have previously requested from the managing members of Madison Hotel Owners, LLC, copies of all books and records, including, but not limited to checkbooks, general ledgers, and further documents as set forth in the correspondence of the firm of Arik Eshel, CPA & Associates, PC.

While your office has submitted some documents, certainly these documents are not responsive to all of what my clients were seeking.

Please consider this letter as a deadline to advise us by Friday, March 9, 2012 where all of the financial documents of the company are located, whether they are in the office of the bookkeeper, the hotel, the CPA, or in the possession of individual members, including, but not limited to Mr. Ben Zion Suky and/or Josef Ben Moha, and then when these records can be reviewed by our accountants.

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If I do not hear from your offices by Friday of where these documents can be reviewed by our accountants next week, a Rule 2004 motion will be made to compel the production of these records.

If the documents further should not be provided to my clients' accountants, an Order will be sought before the Court and if necessary, a further Order seeking a contempt of Court of the managing members of Madison Hotel, LLC.

Should these materials not be subsequently provided, my clients will seek to have a trustee appointed.

Finally, I am aware that there have been numerous emails and telephone calls made by Mr. Suky and Mr. Moha to my clients. These emails and calls are derogatory, threatening, malicious and libelous.

I am requesting that you advise your clients, that a record of all these emails and calls have been kept, and that instead of maliciously defaming my clients, that the documents requested be supplied voluntarily in a timely fashion, and all contact between Mr. Suky and Mr. Ben Moha with my clients shall immediately cease.

There will be no further letters sent requesting this information.

Any and all correspondence shall be addressed only to and through the attorneys, and not individual members.

I await your response.

Very truly yours,

Charles I. Epstein

CIE/ib

cc: Nader Bolour (via email: nader@dorisleslieblau.com)
Havazelet Miller (via email: cmiller1015@aol.com)
Ofek Rachel (via email: ofekyad@walla.com)
Michael Avidan (via email: michaelavidan@walla.com)
Rafael Malki (via email: rafaelmalki@hotmail.com)